



September 22, 2004

Ms. Rebecca Brown, OLA Central Section
CIWMB
P.O. 4025
Sacramento, CA 95812-4025

Dear Ms. Brown:

This letter is in response to your letter dated June 2, 2004 concerning the City's 2002 Annual Report. The City does not wish to submit a SB 1066 Time Extension/ADR application at this time, however, we wish to reserve the right to submit a petition.

During the City's 1999/2000 AB 939 biennial review, the CIWMB found that the City had made a good faith effort to comply with AB 939. During 2001 and 2002, the City continued to carry out the same diversion programs which resulted in the good faith finding for 1999/2000.

As you know, the City has implemented numerous diversion programs since the enactment of AB 939. The City has invested millions of dollars in the construction of the Victor Valley Materials Recovery Facility to sort recoverable materials. The City has implemented a curbside recycling program for residents of single-family homes and small multi-family units. It has recycling service for large multi-family complexes—via dumpsters or clusters of recycling barrels. The City has a separate recycling collection program for its commercial customers using front loader bins or roll-off boxes. The City also has implemented extensive "select" recycling routes for the commercial sector, whereby we have routed "clean" commercial trash accounts (offices and retail locations) onto separate trash routes. Loads from the select routes are taken to the MRF for sorting. In addition, all compactor or roll-off loads that have a high percentage of cardboard or other fibers are being sent to the MRF to be processed. All City Parks & Recreation turf areas are maintained using mulching mowers. In addition, through the Mojave Desert & Mountain Integrated Waste Management JPA's Master Composter program, the City has an extensive residential backyard composting and grass mulching program. The City's Public Works Department continues to recover and reuse asphalt and concrete for road projects and erosion control projects. The City's Public Works Department has begun using re-refined motor oil and hydraulic oil in City vehicles. These programs continued to operate during the 2001/2002 review period and continued to be effective. Tonnage recovered through these City diversion programs increased in 2001 and 2002 over 1999 and 2000 year tonnages.

During 2002, the City implemented a new project to collect CRT's, and kicked off a new curbside recycling contest (The Right Stuff) in cooperation with its hauler, Victorville Disposal. The City also expanded recycling at the County Fairgrounds by providing CRV container recycling bins to the Fairgrounds.



It should be noted that the 2002 recycling rate of 40% which is currently posted on the CIWMB website is based upon a disposal quantity of 78,379 tons. When the City submitted its 2002 Annual Report, however, the City included a "Reporting Year Disposal Tonnage Modification Request and Certification." This request included a reduction of 4,280 tons so that the reporting year disposal tonnage would be 74,099 tons. Justification for the reduction was included on the Modification Request form. With the reduction in tons identified in the Modification Request, the City's 2002 diversion rate should be 43%, not the currently posted figure of 40%.

In summary, the City has implemented extensive diversion programs to comply with AB 939. These programs have been effective in diverting materials from landfill. During the 1999/2000 biennial review, the City received a "good faith effort" determination from the CIWMB based upon the effectiveness and extent of the diversion programs the City had implemented. The City continued to operate these diversion programs and enhanced the programs during the 2001/2002 review period. The City believes that it is continuing to make a good faith effort to comply with the requirements of AB 939.

Thank you for your attention to this matter. Please call me at (760) 955-5086 if you have any questions or need additional information.

Sincerely,

Dana L. Armstrong
Solid Waste Manager

cc. Jon Roberts, City Manager
Adair Most, Director of Finance
John Davis, Administrator, Mojave Desert & Mountain Integrated Waste Management JPA
Eric Herbert, Vice-President, Burrtec Waste Industries